

1 SEAN P. FLYNN (SBN: 15408)
2 **GORDON REES SCULLY MANSUKHANI**
3 1 Liberty Street, Suite 424
4 Reno, NV 89501
5 Telephone: (775) 467-2610
6 Email: sflynn@grsm.com

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8 Attorneys for Defendant
9 ALLIED COLLECTION SERVICES, INC.

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DEREK LAND,

Plaintiff,

vs.

ALLIED COLLECTION SERVICES, INC.;
EXPERIAN INFORMATION SOLUTIONS,
INC.' EQUIFAX INFORMATION
SERVICES, LLC; and TRANS UNION LLC,

Defendant.

CASE NO. 2:22-cv-01641-APG-EJY

**JOINT MOTION FOR EXTENSION OF
TIME TO FILE OPPOSITION TO
PLAINTIFF'S ATTORNEY FEE MOTION
(SECOND REQUEST)**

Gordon Rees Scully Mansukhani, LLP
1 East Liberty Street, Suite 424
Reno, NV 89501

1 Defendant Allied Collection Services, Inc. (“Defendant”) pursuant to LR IA 6-1, with
 2 the stipulated consent of, Plaintiff Derek Land (“Plaintiff”), respectfully move the Court for an
 3 Order Extending Time for Defendant to file its Opposition to Plaintiff’s Motion for Attorney
 4 Fees [Dkt. # 72]. This is Defendant’s second request for an extension of time relative to
 5 Plaintiff’s Motion. Defendant further states the following in support of this request:

- 6 1. On August 19, 2024, the Court entered an Order setting the deadline for plaintiff to file
 7 his motion for attorney’s fees and costs as September 11, 2024.
- 8 2. That same day, the court set Defendant’s deadline to file its opposition as October 9,
 9 2024.
- 10 3. On September 11, 2024, Plaintiff filed his Motion for Attorneys Fees. [Dkt. 72.]
- 11 4. At the time of the August 19, 2024 hearing, Defense Counsel failed to identify that its
 12 opposition deadline fell in the middle of a preplanned family vacation.
- 13 5. On October 3, 2024, Defense Counsel reached out to Plaintiff’s Counsel regarding the
 14 instant Joint Motion to Extend Time and requested until October 18 to file its
 15 Opposition.
- 16 6. On October 4, 2024, Plaintiff’s Counsel responded that it did not object to Defendant’s
 17 Opposition deadline being extended to October 18.
- 18 7. On October 4, 2024, Defendant filed its first request for an extension of time to file it’s
 19 opposition to Plaintiff’s Motion for Attorney’s Fees. [Dkt. #73.]
- 20 8. On October 7, 2024, the Court Granted the Joint Motion. [Dkt. #74.]
- 21 9. Since the first request, Defense Counsel’s father-in-law has been hospitalized, again.
 22 He is elderly, and diabetic. Family have been flying back to be with him.
- 23 10. This has resulted in child care obligations falling solely on Defense Counsel.
- 24 11. On October 16, Defense Counsel notified Plaintiff’s Counsel of same and requested a
 25 second extension of time to file the opposition to Plaintiff’s Motion for Attorney’s Fees
 26 to October 25.
- 27 12. On October 17, Plaintiff’s Counsel advised it had no opposition to this second request.

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1 13. There is no reply deadline, and no hearing scheduled, that would be impacted by the
2 requested extension of time.

3 For the reasons stated and for good cause shown, Defendant and Plaintiff respectfully
4 request entry of an Order allowing Defendant to file Its opposition to Plaintiff's Motion for
5 Attorney's Fees and Costs on or before October 25, 2024.

6 Dated: October 17, 2024

GORDON REES SCULLY MANSUKHANI

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8 By: s/ Sean P. Flynn
9 Sean P. Flynn (SBN 15408)
10 Attorneys for Defendant
11 ALLIED COLLECTION SERVICES,
12 INC.

CONSUMER ATTORNEYS

11 Dated: October 17, 2024

12 By: /s/ Michael Yancey
13 Tarek N. Chami – (MI # P76407)
14 Admitted Pro Hac Vice Only
15 22000 Michigan Ave, Suite 200
16 Dearborn, MI 48124
17 Phone: 313-444-5029
18 tchami@consumerattorneys.com

19 *Attorneys for Plaintiff,*
20 *Derek Land*

21 **IT IS SO ORDERED.**

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23 U.S. MAGISTRATE JUDGE

24 Dated: October 17, 2024
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Reno, NV 89501